



The State of New Hampshire  
*Department of Environmental Services*



Michael P. Nolin  
Commissioner

October 2, 2006

William H. Smagula  
Director—PSNH Generation  
Public Service of New Hampshire  
P.O. Box 330  
Manchester, NH 03105-0330

**Re: Response to Baseline Testing Plan Proposal**

Dear Mr. Smagula:

DES is in receipt of your August 30, 2006 letter entitled "Public Service Company of New Hampshire Baseline Testing Plan Pursuant to RSA 125-O:14." We appreciate your response to this statutory requirement, as well as our recent meetings and other communications to better coordinate our efforts to ensure compliance with the numerous requirements and aggressive deadlines set forth in Laws of 2005, Chapter 105 (HB 1673). The purpose of this letter is to provide comments and to request additional information as set forth below.

**Stack Testing**

PSNH has proposed conducting stack testing using the sorbent trap method. While RSA 125-O:14 does not specify the stack test methods to be used, RSA 125-O:15, which requires PSNH to conduct stack testing twice per year subsequent to the testing required under RSA 125-O:14, specifies that the stack testing shall employ a federally recognized and approved methodology. Since the sorbent trap method is not yet an EPA approved method, PSNH must provide technical information demonstrating that the sorbent trap method will yield comparable results before DES is able to approve its use.

Given the time constraints, DES would prefer that PSNH conduct the stack testing using the Ontario-Hydro Method (ASTM Method D 6784-02, which has been conducted twice at PSNH) or EPA Method 29. While we understand the potential practical and/or financial implications of either of these methods, the results obtained using these Methods may be more defensible as a currently approved methodology. In addition, Method 29 offers the advantage of better accounting for mercury in the particulate form and is the currently acceptable compliance test method for mercury emissions. While we are open to further discussion on this matter, we should all be comfortable that whatever method is used will yield results that are consistent and that the data is of sufficient quality to be used in the determination of early and over-compliance reduction credits pursuant to RSA 125-O:16. Careful consideration should be given as to how this data will be compared to either newer, federally approved methods or CEM data in calculating these credits.

PSNH proposed conducting all four stack tests on MK1 and MK2 prior to February 1, 2007 and stated that a schedule would be provided as soon as it becomes available. Since at least 4 of the coal samples taken must correspond with the stack testing, the stack testing must be completed no later than August 1, 2007 (the date that the coal sampling must be completed) and the final stack test report must be submitted by December 8, 2007. While DES understands the time constraints resulting from the upcoming U.S. Department of Energy sorbent injection trials, DES is concerned that the complexity of the testing and weather considerations may make this schedule difficult to achieve and would like to discuss a contingency plan.

### Coal Sampling

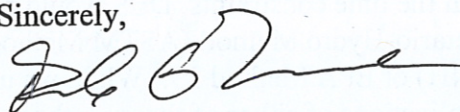
PSNH proposed using ASTM D6722-01 (2006) Standard Test Method for Total Mercury in Coal and Coal Combustion Residues by Direct Combustion Analysis and ASTM D3684-01 (2006) Standard Test Method for Total Mercury in Coal by the Oxygen Bomb Combustion/Atomic Absorption Method for the coal sampling program. DES is requesting that PSNH provide more detailed documentation on the sampling location and procedure used for each boiler, in order to ensure a representative sample. This documentation should include, but not limited to: a description of the sampling equipment used, the sampling frequency, time lag between sampling and introduction of fuel to the boiler, and the potential for biasing in the proposed sampling method.

In addition, PSNH stated that the 4 stack tests "will be conducted while burning coals traditionally used, excluding trial or test coal blends." DES is requesting that PSNH provide further explanation of how it will determine the definition of "coals traditionally used" and demonstrate that the samples are representative of such coals.

### Conclusion

DES looks forward to working with PSNH to meet all of the requirements set for in RSA 125-O. Due to time and resource considerations, it is important these issues be addressed in the very near future. DES personnel are available to meet with PSNH representatives if you believe that it would be beneficial. In the alternative, DES asks that PSNH respond to the issues discussed above and provide proposed dates for conducting the upcoming stack testing. If you have any questions, I can be reached at 271-0882.

Sincerely,



Pamela G. Monroe  
Compliance Bureau Administrator  
Air Resources Division

Cc: Robert R. Scott, Director, ARD  
Laurel Brown, PSNH